

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

CHRISTINE BORDEN,

Plaintiff,

Vs.

BANK OF AMERICA, NA (“BANA”),  
WESTCLIFF TECHNOLOGIES, INC. d/b/a  
NATIONAL BITCOIN ATM, and CASH  
CLOUD, INC., d/b/a COIN CLOUD,

Defendants.

Civil Action No. 2:22-cv-04076-BHH

**CONSENT MOTION FOR EXTENSION  
OF TIME**

Plaintiff Christine Borden and Defendant Westcliff Technologies, Inc. d/b/a National Bitcoin ATM (“Westcliff”) hereby jointly move for a twenty-four (24) day extension of time until January 28, 2023 to respond to Defendant Westcliff Technologies, Inc.’s Motion to Dismiss (FRCP 12(b)(6)) and Memorandum of Law in Support filed with this Court on December 21, 2022 (Entry Number 9).

Pursuant to Local Rule 6.01, the Plaintiff would additionally provide the following information:

1. The current deadline for the Plaintiff to respond to Westcliff’s Motion to Dismiss (FRCP 12(b)(6)) and Memorandum of Law in Support (Docket Entry 9) is January 4, 2023.
2. The number of additional days requested to respond to Westcliff’s Motion to Dismiss (FRCP 12(b)(6)) and Memorandum in Support is twenty-four (24) days.

3. The new deadline would be January 28, 2022
4. The requested change would not affect other deadlines.

The undersigned certifies that, prior to making this motion he contacted opposing counsel for Westcliff concerning the subject motion pursuant to Local Rule 7.02. All counsel consent to this motion.

Respectfully submitted,

s/ Dave Maxfield

David A. Maxfield, Fed ID 6293  
Dave Maxfield, Attorney, LLC  
P.O. Box 11865  
Columbia, South Carolina 29211  
(803) 509-6800  
(855) 299-1656 (fax)  
dave@consumerlawsc.com  
*Attorney for Christine Borden*

s/ Tara E. Nauful

Tara E. Nauful, Fed ID 5864  
999 Lake Hunter Circle, Suite D  
Mount Pleasant, SC 29464  
(843) 793-4744  
tara@bestlawsc.com  
*Attorneys for Westcliff Technologies, Inc.*

DATED: December 22, 2022